

**IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI
AT INDEPENDENCE**

POLICE NO. :	17-4330
PROSECUTOR NO. :	095443078

STATE OF MISSOURI,	)	
	)	
PLAINTIFF,	)	
vs.	)	
JERRY L. WILLIAMS III	)	
10104 68th Terrace,	)	CASE NO. 1816-CR
Kansas City, MO - 64138	)	DIVISION
DOB: 04/16/1989	)	
Race/Sex: B/M;	)	
SSN: XXX-XX-XXXX	)	
DEFENDANT.	)	

COMPLAINT

Count I. Attempted Robbery - 1st Degree (570.023-001Y20171201.1)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Sections 570.023 and 562.012, RSMo, committed the **class B felony of Attempted Robbery in the First Degree**, punishable upon conviction under Section 558.011, RSMo, in that on or about December 31, 2017, in the County of Jackson, State of Missouri, the Defendant, while displaying a firearm, demanded [REDACTED] give the Defendant money which was in the possession or charge of [REDACTED] and/or his employer, and such conduct was a substantial step toward the commission of the crime Robbery in the First Degree and was done for the purpose of committing such Robbery.

An individual convicted and sentenced for this offense shall not be eligible for parole until eighty-five percent of the sentence is served.

The range of punishment for a class B felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than five (5) years and not to exceed fifteen (15) years, or life imprisonment.

Count II. Armed Criminal Action (571.015-001Y19755212.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 571.015, RSMo, committed the felony of armed criminal action, punishable upon conviction under Section 571.015.2, RSMo, in that on or about December 31, 2017, in the County of Jackson, State of Missouri, the defendant committed the felony of Attempted Robbery in the First Degree

State vs. Jerry L. Williams III

as charged in Count I, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of Attempted Robbery in the First Degree by, with and through, the knowing use, assistance and aid of a deadly weapon, and on or about February 25, 2010, in the Circuit Court of Jackson County, Missouri, Case No. 0916-CR04856-01, the defendant was convicted of the offense of armed criminal action.

The range of punishment for the offense of Armed Criminal Action in violation of section 571.015 RSMo. as a second offense is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than five (5) years without eligibility for parole, probation, conditional release or suspended imposition or execution of sentence for a period of five (5) calendar years. Any punishment imposed pursuant to section 571.015 RSMo. shall be in addition to any punishment provided by law for the crime committed by, with, or through the use, assistance, or aid of a dangerous instrument or deadly weapon.

The facts that form the basis for this information and belief are contained in the attached statement(s) of facts, made a part hereof and submitted as a basis upon which this court may find the existence of probable cause.

Wherefore, the Prosecuting Attorney prays that an arrest warrant be issued as provided by law.

JEAN PETERS BAKER

Prosecuting Attorney
Jackson County, Missouri
by,

/s/ Sean T. Foley

Sean T. Foley (#64851)
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WITNESSES:

CPL Nathan Brand , 10000 E. 59th Street, Kansas City, MO - 64133
PO John Gilligan , 10000 E. 59th Street, Raytown, MO - 64133
PO Larry Jackson , 10000 E. 59th Street, Raytown, MO - 64133

[REDACTED]

[REDACTED]

CPL Jeremy Riddle , 10000 E. 59th Street, Raytown, MO - 64133
PO Lonnie Wood , 10000 E. 59th Street, Raytown, MO - 64133

Probable Cause Statement Form

Date: 12/31/17

Report: 17-4330

I, Detective L. Jackson knowing that false statements on this form are punishable by law, state that the facts contained herein are true.

I have probable cause to believe that on 12/31/17 at 8900 350 Hwy., Raytown, Jackson County, Missouri, 64133 Jerry Lee Williams III B/M, 04/16/89, [REDACTED] committed one or more criminal offense(s).

The facts supporting this belief are as follows:

On 12/31/17 at approximately 2028 hours, Sgt. N. Brand, Officer L Dale, Officer J Gilligan, Officer Lonnie Wood, Cpl. J Riddle, and I responded to Easy Pickins Convenience Store, 8900 350 Hwy., Jackson County, Raytown Missouri, 64133, on an armed robbery in progress. While en route Police Dispatch advised that the suspect, an unknown male dressed in dark pants, a dark hooded jacket, and armed with a handgun fled from the store on foot; north on Hunter, and then east (behind some houses on Hunter).

Upon our arrival, we set up security perimeter (68th Street and Lane to 68th Terrace and Hunter) and searched for the suspect. Sgt. Brand observed a black male, in a black hooded jacket, black, red, and white gloves, and black pants, with a black back pack on, run out from behind some houses on the west side of Lane; running east towards 68th Terrace. Sgt. Brand broadcasted the suspect's location and pursued after him; temporarily losing sight of the suspect at 9000 E 68th Street. Officer Wood and Officer Gilligan responded to the location and assisted Sgt. Brand with searching for the suspect. While searching the area, Officer Brand, Officer Wood, and Officer Gilligan heard a single gunshot in the immediately area surrounding them. While continuing their search, Sgt. Brand observed the suspect lying down under a tree, in the northeast corner yard of 9002 E. 68th Terrace. Sgt. Brand commanded the suspect to stand up and walk away from the tree. The suspect did as commanded and was later apprehended by Officer Gilligan and Officer Wood. The suspect identified himself as Jerry Lee Williams.

Officer Dale and I responded to Easy Pickins, made contact with victims, [REDACTED] and [REDACTED] and transported them to Mr. Williams's location. Mr. [REDACTED] and Mr. [REDACTED] both confirmed Mr. William to be the suspect in the armed robbery.

Sgt. Brand and Cpl. Riddle searched the area where Mr. Williams was hiding and observed a pair of black, white, and red gloves lying on the ground under the tree. Sgt. Brand also observed a black backpack, behind a shed in the west side back yard at 9002 E. 68th Terrace.

Cpl. Riddle searched the surrounding area, checking for additional evidentiary items. Cpl. Riddle made contact with [REDACTED], a resident at 9000 E. 68th Terr. He explained the situation to Mr. [REDACTED] and asked for his permission to search his back yard, which had a privacy fence separating it from the yard of 9000 E. 68th Terr. Mr. [REDACTED] granted Cpl Riddle access to his back yard via his home. While searching Mr. [REDACTED] yard, Cpl. Riddle located a purple, SCCY CPX-1, 9mm, semi-automatic pistol near the southeast corner. Cpl. Riddle observed no magazine in the gun. He continued to search yard and located a magazine for the gun approximately five feet away from where he found the gun. He observed the magazine to have one 9mm round in it. The location of the items were directly over the fence from the area where Sgt. Brand had seen the suspect running. Officer J Gilligan photographed the firearm and magazine's location in the yard. Cpl. Riddle recovered the firearm, 9mm round, and magazine as evidence.

Officer Wood photographed and recovered the items as evidence. I responded to Easy Pickins and viewed the surveillance camera footage of the incident. The footage showed and confirmed Mr. Williams to be the suspect in the armed robbery. I recovered a copy of video footage as evidence.

At approximately 2246 hours, I contacted Mr. Williams in the detention vestibule waiting area. I introduced myself, advised Mr. Williams of his charges and escorted him to an interview room. While in the interview room I read Mr. Williams his Miranda Right aloud. Upon hearing me, Mr. Williams invoked his constitutional right and refused to talk to me.

Name: Detective Larry Jackson

Signature:

A handwritten signature in blue ink, appearing to read 'L. Jackson', followed by the date '04/21'.